

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JOE HAND PROMOTIONS, INC.,

Plaintiff,

- vs -

BOOT TEXAN KITCHEN LLC, *et al.*,

Defendants.

CASE NO.: 4:23-cv-04817

**PLAINTIFF, JOE HAND PROMOTIONS, INC.'S  
NOTICE OF INITIAL DISCLOSURES**

COMES NOW, Plaintiff, Joe Hand Promotions, Inc., by its attorney, and files its Notice of Initial Disclosures notifying the Court that Plaintiff served its Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) on April 26, 2024 on Defendants, Boot Texan Kitchen LLC, d/b/a Boot Texan Kitchen, Angeline Latchley, a/k/a Angeline Geneva, and Lester A. Nichols Jr., a/k/a Anthony Nichols, by service on their attorney of record.

Respectfully submitted,

JAMIE KING, P.C.

/s/ Jamie King

Jamie King  
Texas State Bar No. 24043755  
PO Box 5757  
Kingwood, TX 77325  
(T): 832-584-0106  
(F): 888-247-0443  
(E): [Jamie@jamiekingspc.com](mailto:Jamie@jamiekingspc.com)

ATTORNEY FOR PLAINTIFF,  
JOE HAND PROMOTIONS, INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 26<sup>th</sup> day of April, 2024, a true and correct copy of the foregoing was served as follows:

*Via this Court's CM/ECF System, U.S. Mail, Postage Prepaid, and Email upon:*

Derek H. Deyon  
The Deyon Law Group, P.L.L.C.  
440 Louisiana Street, Suite 900  
Houston, Texas 77002  
[ddeyon@deyonlawgroup.com](mailto:ddeyon@deyonlawgroup.com)

/s/ Jamie King  
Jamie King

4/26/2024  
Date